

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DEBORAH WOODS

Plaintiff,

- against -

THE CITY OF NEW YORK, PORT AUTHORITY OF
NEW YORK AND NEW JERSEY, AND
POLICE/PEACE/SECURITY OFFICER "JOHN
DOE",

Defendants.

Civil Action No.: 15-cv-5167

DECLARATION PURSUANT TO LOCAL CIVIL RULE 1.4

SCOTT P. TAYLOR declares as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and the United States District Court for the Eastern District of New York.
2. I am a partner of the law firm of Rosenbaum & Taylor, P.C.
3. I respectfully submit this declaration, pursuant to Local Civil Rule 1.4 of the United States District Courts for the Southern and Eastern Districts of New York, in support of the Stipulation and Order substituting Rosenbaum & Taylor, P.C. for Dentons US LLP as counsel of record for Defendant PORT AUTHORITY OF NEW YORK AND NEW JERSEY in the above-captioned action.
4. The reason for the change in counsel is that defendant PORT AUTHORITY OF NEW YORK AND NEW JERSEY tendered its defense to First Specialty Insurance Corporation.

5. That tender was accepted and First Specialty Insurance Corporation has requested this change in counsel, as is its right under its insurance policy.

6. The case is presently in the preliminary stages of discovery, and an initial Court conference is scheduled for December 9, 2015.

7. Outgoing counsel is not asserting a retaining or charging lien.

8. I respectfully submit that the substitution of counsel will not unnecessarily delay this action or prejudice any party, and therefore respectfully request that the Court approve the Stipulation and Order of Substitution of Counsel submitted herewith.

9. I certify under penalty of perjury that the foregoing is true and correct.



SCOTT P. TAYLOR

Sworn to me before this 11th day
of November, 2015

Notary Public

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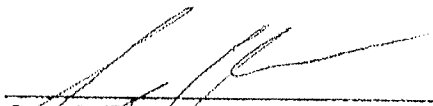
CONSENT TO CHANGE
ATTORNEYS

IT IS HEREBY CONSENTED that ROSENBAUM & TAYLOR P.C., with offices located at 7-11 South Broadway, Suite 401, White Plains, New York, be substituted as attorneys of record for PORT AUTHORITY OF NEW YORK AND NEW JERSEY in the above entitled action in place and stead of DENTONS US LLP as of the date hereof.

Dated: White Plains, New York
October 23, 2015

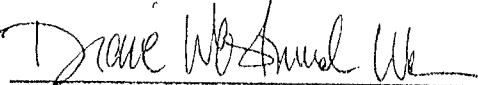
ROSENBAUM & TAYLOR, P.C.

DENTONS US LLP



Scott P. Taylor, Esq.

Incoming Attorneys for Defendant
PORT AUTHORITY OF NEW YORK AND
NEW JERSEY
7-11 South Broadway, Suite 401
White Plains, New York 10601
(914) 358-4422



Diane Westwood Wilson, Esq.

Outgoing Attorneys for Defendant
PORT AUTHORITY OF NEW YORK AND
NEW JERSEY
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 905-8369

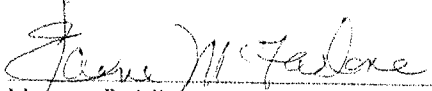
Port Authority of New York and New Jersey


By: _____

4 World Trade Center -- 24th Floor
New York, New York 10007

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

On the 10th day of December, 2015, before me personally came
Ramon Eretman, who, being by me duly sworn, did depose and say, that he/she is
the Secretary of PORT AUTHORITY OF NEW YORK AND NEW
JERSEY, a defendant named herein and who executed the within instrument.


Notary Public

ELAINE MCFARLANE
Notary Public - State of New York
No. 01MC6005820
Qualified in BRONX
Commission Expires APRIL 20, 2018